

**quinn emanuel trial lawyers | washington, dc**

1300 I Street NW, Suite 900, Washington, District of Columbia 20005-3314 | TEL (202) 538-8000 FAX (202) 538-8100

WRITER'S DIRECT DIAL NO.  
**(202) 538-8120**

WRITER'S EMAIL ADDRESS  
**williamburck@quinnemanuel.com**

March 20, 2024

**VIA ECF**

Hon. Gary Stein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 702  
New York, NY 10007

Re: Northwest Biotherapeutics, Inc. v. Canaccord Genuity LLC, et al.,  
No. 1:22-cv-10185-GHW-GS

Dear Judge Stein:

We represent Defendant Citadel Securities LLC and write on behalf of all Defendants<sup>1</sup> in brief response to Plaintiff Northwest Biotherapeutics, Inc.'s ("NWBO"), March 20, 2024 opposition to Defendants' request for a 30-day extension of time to file motions to dismiss, ECF No. 152.

Defendants requested an extension of time both as a courtesy to accommodate their counsel's schedules, and to permit time to address 161 new pages added in NWBO's Second Amended Complaint ("SAC") (17 pages of new allegations and 141 pages across eight new exhibits). NWBO's response—that Defendants should be limited to a single joint motion to dismiss of 15 pages and a 4-day extension of time—is a disappointing and improper attempt to prevent a fair evaluation of the SAC's allegations.

Under this Court's rules, each Defendant is entitled to a motion to dismiss of up to 25 pages. While Defendants intend to coordinate and seek to file a single joint motion to dismiss of 25 pages, NWBO's position that they should be limited to a single 15 page motion to dismiss is unreasonable and would be unduly prejudicial.

---

<sup>1</sup> Defendants are Canaccord Genuity LLC, Citadel Securities LLC, G1 Execution Services LLC, GTS Securities LLC, Instinet LLC, Lime Trading Corp., and Virtu Americas LLC.

**quinn emanuel urquhart & sullivan, llp**

ATLANTA | AUSTIN | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON |  
LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY |  
SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

Defendants respectfully request that the Court grant their request for a 30-day extension of time to file motions to dismiss for the reasons set forth in their letter motion, ECF No. 151, and above.

Respectfully submitted,

/s/ William A. Burck  
William A. Burck

cc: All counsel of record (via ECF)